



BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

**FILED**

06-15-07  
11:22 AM

Order Instituting Rulemaking on the Commission's  
Own motion into the service quality standards for  
All telecommunications carriers and revisions to  
General Order 133-B

R.02-12-004

**REPLY COMMENTS OF**

**CALAVERAS TELEPHONE COMPANY (U 1004 C)  
CAL-ORE TELEPHONE CO. (U 1006 C)  
DUCOR TELEPHONE COMPANY (U 1007 C)  
GLOBAL VALLEY NETWORKS, INC. (U 1008 C)  
FORESTHILL TELEPHONE CO. (U 1009 C)  
HAPPY VALLEY TELEPHONE COMPANY ( U 1010 C)  
HORNITOS TELEPHONE COMPANY ( U 1011 C)  
KERMAN TELEPHONE COMPANY (U 1012 C)  
PINNACLES TELEPHONE CO. (U 1013 C)  
THE PONDEROSA TELEPHONE CO. (U 1014 C)  
SIERRA TELEPHONE COMPANY, INC. (U 1016 C)  
THE SISKIYOU TELEPHONE COMPANY (U 1017 C)  
THE VOLCANO TELEPHONE COMPANY (U 1019 C)  
WINTERHAVEN TELEPHONE COMPANY (U 1021 C)**

**ON ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO**

E. Garth Black  
Mark P. Schreiber  
Sean P. Beatty  
Patrick M. Rosvall  
COOPER, WHITE & COOPER LLP  
201 California Street – 17<sup>th</sup> Floor  
San Francisco, CA 94111  
Telephone: (415) 433-1900  
Telecopier: (415) 433-5530

Attorneys for Small LECs

June 15, 2007

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Calaveras Telephone Company, Cal-Ore Telephone Co., Ducor Telephone Company, Global Valley Networks, Inc., Foresthill Telephone Co., Happy Valley Telephone Company, Hornitos Telephone Company, Kerman Telephone Co., Pinnacles Telephone Co., The Ponderosa Telephone Co., Sierra Telephone Company, Inc., The Siskiyou Telephone Company, The Volcano Telephone Company and Winterhaven Telephone Company (collectively, the "Small LECs") hereby file these reply comments on the Assigned Commissioner's Ruling and Scoping Memo ("Ruling") issued in this Rulemaking 02-12-004 ("Rulemaking") on March 30, 2007. In summary, it is clear from the opening comments of the parties and the record developed to date in this proceeding that the Commission does not need to concern itself with any new service quality standards or reporting for the Small LECs at this time. The quality of telephone service provided by the Small LECs remains uniformly excellent, and there will be no benefit to customers, the Small LECs or the Commission resulting from the creation of new standards or reporting requirements applicable to the Small LECs. Moreover, it is clear that the Commission has before it some very important choices concerning how it will monitor and regulate service quality for URF companies, CLECs and wireless companies in the rapidly evolving telecommunications market in the coming years. These companies operate in different competitive markets from the Small LECs, and the Commission could not properly apply monitoring rules and service quality standards developed for those companies to the Small LECs

1 without careful analysis of how the Small LECs differ from these other entities. It is not the time to  
2 undertake the arduous task of evaluating and implementing new service quality standards or reporting  
3 requirements for the Small LECs that would be of dubious value to customers and that would be  
4 expensive to implement.

5  
6 **I.**  
7 **THE OPENING COMMENTS OF NO PARTY PROVIDED ANY**  
8 **EVIDENCE OR EVEN SUGGESTED THAT THE SERVICE QUALITY**  
9 **OF THE SMALL LECs REQUIRES ADDITIONAL MONITORING**  
10 **OR THE IMPOSITION OF ANY NEW STANDARDS**

11 The Small LECs explained in their opening comments in this proceeding that they had already  
12 submitted a substantial amount of data concerning their service quality in an earlier phase of this  
13 proceeding, and that the data they submitted demonstrated that across the board the Small LECs were  
14 providing uniformly and consistently excellent service to their customers by every measurement  
15 employed by the Commission. No party has attempted to rebut this evidence and it must be viewed  
16 as uncontested and correct.

17  
18 **II.**  
19 **IN LIGHT OF THE HIGH QUALITY OF SMALL LEC**  
20 **SERVICE, THE BENEFITS OF NEW MEASUREMENTS**  
21 **OR RULES ARE LIKELY TO BE INSIGNIFICANT AND**  
22 **THE COSTS SUBSTANTIAL**

23 In light of the uncontested evidence of the existing good service quality provided by the Small  
24 LECs, it seems obvious that no new service standards are required insofar as the Small LECs are  
25 concerned.<sup>1</sup> As the Small LECs pointed out in their opening comments, they are presently subject to  
26 reporting under General Order 133-B and do not object to its continuation for the time being. The  
27 Small LECs have systems in place that capture the necessary information, and the expense of  
28 continuing these procedures and reporting when required will not be great and are already reflected in

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<sup>1</sup> It appears that DRA's proposal for customer surveys applies only to URF companies. (DRA Opening Comments, p. 6). TURN's support for customer surveys is "luke warm" at best. (TURN Opening Comments, pp. 16-17). There is no basis in the record for extending any regime of Commission sponsored customer surveys that might be adopted to the Small LECs.

1 their rates and revenues. However, adding additional measurement and reporting obligations or  
2 making material modifications as DRA and TURN have proposed is not justified.

3 In opening comments no party presented a sound justification for why new service  
4 measurements or reporting by Small LECs would benefit customers. This is true with respect both to  
5 new standards proposed by DRA and TURN, and the "positive reporting" DRA proposes, as opposed  
6 to the exception reporting that presently exists for the Small LECs. (DRA Opening Comments, p. 10).  
7 Additional reporting by the Small LECs will be expensive, and these costs will inevitably be paid by  
8 telephone customers. In order to justify new reporting for the Small LECs, the Commission should  
9 be able to identify clear benefits to the customers who will pay for the costs of the new requirements.  
10 The record in this proceeding does not support new reporting for Small LECs, and any perceived  
11 benefits would be minimal or nonexistent.

12 If the Commission creates any new G.O. 133-B reporting and measurement obligations, it  
13 should exempt the Small LECs from them. Several of the existing G.O. 133-B measurements already  
14 provide such an exemption on a de facto basis by creating a size threshold for reporting offices. For  
15 example, current G.O. 133-B, §3.7 for addressing Directory Assistance Operator Answering Time  
16 applies only to those traffic offices handling 2,000 on an average business day. This limit effectively  
17 exempts many of the Small LECs from this standard. Presumably, this de facto exemption was  
18 adopted because of the expense of measurement and reporting as well as a perception that there was  
19 no problem with respect to small traffic offices that required the Commission's attention. The record  
20 concerning Small LEC service quality already in the record in this proceeding supports such an  
21 exemption to any new measurement or reporting obligations.

22 The additional service quality standards proposed by DRA would exempt small carriers who  
23 are not COLRS (DRA Opening Comments, p. 21). Presumably, this proposed small carrier  
24 exemption is based on unique circumstances of small carriers who are not COLRS, including greater  
25 per customer cost of any new requirements. The apparent reasons for this DRA proposed exemption  
26 also apply to the Small LECs, and should be extended to them as well if any of DRA's proposals are  
27 adopted. While COLRS are subject to more rigorous regulation with respect to the range of service  
28 offerings they must provide than are competitive carriers, this proposed exemption is a tacit

1 admission by DRA that the size of a carrier may influence the amount of service quality measurement  
2 and reporting that the Commission should require of smaller carriers for reasons of cost and  
3 efficiency.

4 The Small LECs also note that both TURN and DRA propose the elimination of existing G.O.  
5 133-B standards for Held Primary Service Orders and Line Energizing Commitments Met. The  
6 Small LECs support the elimination of these standards for the reasons stated by DRA and TURN, i.e.  
7 their lack of value in the existing California telecommunications market.

### 8 9 III.

#### 10 DRA'S PROPOSED CHANGES TO G.O. 133-B ARE NOT SUPPORTED

11 DRA proposes that four measures of operator service answering time contained in existing  
12 G.O. 133-B be combined into one standard. (DRA Opening Comments, p. 8). This proposal is not  
13 feasible for the Small LECs without significant further modification of G.O. 133-B for Small LECs,  
14 and without significant additional expense. Presently, toll operator answering time applies to offices  
15 that receive 2,000 or more calls per day. (G.O. 133-B, §3.6). Likewise, the standard for directory  
16 assistance operator answering time applies to offices having an average business day call volume of  
17 2,000 or more calls. (G.O. 133-B, § 3.7). The call volume thresholds prescribed by these  
18 measurements exempt some but not all of the Small LECs, and the Small LECs measure and report  
19 accordingly.

20 By contrast, the standard for trouble report answering time and business office answering time  
21 apply only to all centralized service groups which support 10,000 or more lines, a threshold that is  
22 different both in terms of size and triggering criterion. (G.O. 133-B §§3.8 and 3.9). All but four of  
23 the Small LECs are exempt from the §§ 3.8 and 3.9 standards. Therefore, combining these four  
24 standards for measurement and reporting is not possible with the present thresholds. Combining the  
25 standards arguably would exempt all but four of the Small LECs or require reconsideration of the  
26 measurement and reporting thresholds by the Commission, which is not being done as a part of this  
27 record. Moreover, any attempt to modify the quantity thresholds to apply to additional or all Small  
28 LECs would create large additional costs for many of the Small LECs with no countervailing benefit

1 to customers. Making such changes without an adequate evidentiary record would be arbitrary and  
2 further action should not be taken without adequate consideration of the costs and benefits of doing  
3 so.

4 Finally, combining all four existing measures into one omnibus measure for operator service,  
5 changing the reporting to quarterly rather than monthly as DRA also proposes, and providing that a  
6 company failing to meet the prescribed standard for one quarter is to be deemed to fail for the entire  
7 years distorts results of the measurements. One disaster event such as a bad storm could cause a  
8 carrier that provides good service to fail in one quarter as to one of the existing measures, and be  
9 deemed to fail for the entire year as to all four combined measures, thereby distorting the carrier's  
10 performance record. This would be illogical and unfair, and such a standard should not be adopted  
11

#### 12 IV. 13 CONCLUSION

14 For the foregoing reasons, there is no justification for imposing additional service quality  
15 standards or reporting on the Small LECs. In addition, the measures for operator service should not  
16 be combined for the Small LECs. For the time being, and pending further market developments and  
17 assessment of the impact of new rules adopted for URF carriers, CLECs and wireless carriers, the

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1 service quality rules for Small LECs should not be changed except for the elimination of the  
2 standards proposed by DRA and TURN.

3 Executed at San Francisco, California this 15<sup>th</sup> day of June, 2007.

4  
5 Respectfully submitted,

6 E. Garth Black  
7 Mark P. Schreiber  
8 Sean P. Beatty  
9 Patrick M. Rosvall  
10 COOPER, WHITE & COOPER LLP  
11 201 California Street, 17th Floor  
12 San Francisco, CA 94111  
13 (415) 433-1900  
14 FAX: (415) 433-5530

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By 

E. Garth Black  
email: [gblack@cwclaw.com](mailto:gblack@cwclaw.com)

Attorneys for Small LECs

1 CERTIFICATE OF SERVICE BY MAIL

2 I, Martin Spence, declare:

3 I am a resident of the State of California, over the age of eighteen years, and not a party to the  
4 within action. My business address is COOPER, WHITE & COOPER LLP, 201 California Street,  
5 17<sup>th</sup> Floor, San Francisco, CA 94111.

6 On June 15, 2007, I served the following:

7 **REPLY COMMENTS OF**

8  
9 **CALAVERAS TELEPHONE COMPANY (U 1004 C)**  
10 **CAL-ORE TELEPHONE CO. (U 1006 C)**  
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23 **ON ASSIGNED COMMISSIONER'S RULING AND SCOPING MEMO**

24 by email to those who provided email addresses, and by placing a true and correct copy thereof with  
25 the firm's mailing room personnel for mailing in accordance with the firm's ordinary practices to the  
26 parties on the CPUC's service list in this proceeding.

27 I declare under penalty of perjury that the foregoing is true and correct.

28 Executed on June 15, 2007 at San Francisco, California.

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Martin Spence



## SERVICE LIST

### **CPUC Service List as of 05/17/07 Proceeding No. R. 02-12-004**

CHARLES HARAK  
NATIONAL CONSUMER LAW CENTER  
77 SUMMER STREET, 10TH FLOOR  
BOSTON, MA 2110

LAURA L. HOLLOWAY  
NEXTEL COMMUNICATIONS, INC.  
2001 EDMUND HALLEY DRIVE  
RESTON, VA 20091

MARK ASHBY  
CINGULAR WIRELESS  
5565 GLENRIDGE CONNECTOR, STE 1700  
ATLANTA, GA 30342

JOHN SISEMORE, DIRECTOR  
AT&T SERVICES  
175 E. HOUSTON STREET, ROOM 10-M-10  
SAN ANTONIO, TX 78205

ALAN L. PEPPER  
MITCHELL SILBERBERG & KNUPP LLP  
TRIDENT CENTER  
11377 W OLYMPIC BLVD., SUITE 200  
LOS ANGELES, CA 90064-1683

W. LEE BIDDLE  
FERRIS AND BRITTON, APC  
401 W. A ST., SUITE 1600  
SAN DIEGO, CA 92101

M. ESTELA LARA  
CENTRO LA FAMILIA ADVOCACY  
SERVICES, INC  
2014 TULARE STREET, SUITE 711  
FRESNO, CA 93721

CHRISTINE MAILLOUX, ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

BARBARA R. ALEXANDER  
CONSUMER AFFAIRS CONSULTANT  
83 WEDGEWOOD DRIVE  
WINTHROP, ME 4364

TERRANCE SPANN  
US ARMY LEGAL SERVICES AGENCY  
DEPARTMENT OF THE ARMY (JALS-RL)  
901 N. STUART STREET, SUITE 700  
ARLINGTON, VA 22203-1837

JEFFREY M. PFAFF  
SPRINT PCS  
KSOPHN0212-2A509  
6450 SPRINT PARKWAY  
OVERLAND PARK, KS 66251-6100

KATHERINE K. MUDGE, SENIOR COUNSEL  
COVAD COMMUNICATIONS COMPANY  
7000 NORTH MOPAC EXPRESSWAY, 2D FL  
AUSTIN, TX 78731

MICHAEL MANCHESTER  
1749 10TH STREET, NO. 1  
SANTA MONICA, CA 90404

MICHAEL SHAMES, ATTORNEY AT LAW  
UTILITY CONSUMERS' ACTION NETWORK  
3100 FIFTH AVENUE, SUITE B  
SAN DIEGO, CA 92103

MARC D. JOSEPH, ATTORNEY AT LAW  
ADAMS BROADWELL JOSEPH & CARDOZO  
601 GATEWAY BLVD. STE 1000  
SOUTH SAN FRANCISCO, CA 94080

ELAINE M. DUNCAN, ATTORNEY AT LAW  
VERIZON CALIFORNIA INC.  
711 VAN NESS AVENUE, SUITE 300  
SAN FRANCISCO, CA 94102

WILLIAM K. MOSCA  
COMCAST BUSINESS COMMUNICATIONS,  
INC.  
10 INDEPENDENCE WAY  
WARREN, NJ 7059

CORALETTE HANNON, ESQUIRE  
AARP LEGISLATIVE REPRESENTATIVE  
6705 REEDY CREEK ROAD  
CHARLOTTE, NC 28215

ANN JOHNSON  
VERIZON  
HQE02F61  
600 HIDDEN RIDGE  
IRVING, TX 75038

REX KNOWLES, REGIONAL VICE PRESIDENT  
XO COMMUNICATIONS SERVICES, INC.  
111 EAST BROADWAY, SUITE 1000  
SALT LAKE CITY, UT 84111

ALEJANDRO JIMENEZ  
AT&T MOBILITY  
12900 PARK PLAZA DRIVE  
TUSTIN, CA 90703

LAURIE ITKIN  
CRICKET COMMUNICATIONS, INC.  
10307 PACIFIC CENTER COURT  
SAN DIEGO, CA 92121

BOB FINKELSTEIN, ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

REGINA COSTA  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

RUDY REYES  
VERIZON  
711 VAN NESS AVENUE, SUITE 300  
SAN FRANCISCO, CA 94102

WILLIAM NUSBAUM, ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO, CA 94102

CHARLYN A. HOOK  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4107  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JASON J. ZELLER  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5030  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MONICA L. MCCRARY  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5134  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 4300  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KATHERINE S. RITCHEY  
ATTORNEY AT LAW  
JONES DAY  
555 CALIFORNIA STREET, 26TH FLOOR  
SAN FRANCISCO, CA 94104

RANDOLPH W. DEUTSCH  
ATTORNEY AT LAW  
SIDLEY, AUSTIN, BROWN & WOOD, LLP  
SUITE 2000  
555 CALIFORNIA STREET  
SAN FRANCISCO, CA 94104

STEPHEN B. BOWEN, ATTORNEY AT LAW  
BOWEN LAW GROUP  
235 MONTGOMERY STREET, SUITE 920  
SAN FRANCISCO, CA 94104

AGNES NG  
AT&T COMMUNICATIONS OF CALIFORNIA,  
INC.  
525 MARKET ST 20TH FLOOR 4  
SAN FRANCISCO, CA 94105

ANDREA JOHNSON  
AT&T CALIFORNIA  
525 MARKET STREET, SUITE 1944  
SAN FRANCISCO, CA 94105

DAVID P. DISCHER, GENERAL ATTORNEY  
AT&T CALIFORNIA  
525 MARKET STREET, ROOM 2027  
SAN FRANCISCO, CA 94105

GREGORY L. CASTLE, SENIOR COUNSEL  
AT&T CALIFORNIA  
525 MARKET STREET, RM. 2022  
SAN FRANCISCO, CA 94105

JEAN PARKER  
WORKING ASSETS  
101 MARKET STREET, SUITE 700  
SAN FRANCISCO, CA 94105

MARY E. WAND, ATTORNEY AT LAW  
MORRISON & FOERSTER LLP  
425 MARKET STREET  
SAN FRANCISCO, CA 94105

STEPHEN H. KUKTA, COUNSEL  
SPRINT NEXTEL  
201 MISSION STREET, SUITE 1400  
SAN FRANCISCO, CA 94105

THOMAS J. SELHORST  
AT&T CALIFORNIA  
525 MARKET STREET, RM. 2023  
SAN FRANCISCO, CA 94105

JAMES W. MCTARNAGHAN  
ATTORNEY AT LAW  
DUANE MORRIS LLP  
ONE MARKET, SPEAR TOWER 2000  
SAN FRANCISCO, CA 94105-1104

GLENN STOVER, ATTORNEY AT LAW  
STOVER LAW  
221 MAIN STREET, SUITE 800  
SAN FRANCISCO, CA 94105-1906

PETER A. CASCIATO, ATTORNEY AT LAW  
PETER A. CASCIATO P.C.  
355 BRYANT STREET, SUITE 410  
SAN FRANCISCO, CA 94107

CARL K. OSHIRO, ATTORNEY AT LAW  
CSBRT/CSBA  
100 PINE STREET, SUITE 3110  
SAN FRANCISCO, CA 94111

DOUGLAS H. BOSCO  
HOLLAND & KNIGHT, LLC  
50 CALIFORNIA STREET, SUITE 2800  
SAN FRANCISCO, CA 94111

JAMES M. TOBIN, ESQUIRE  
TWO EMBARCADERO CENTER, SUITE 1800  
SAN FRANCISCO, CA 94111

JOHN CLARK, ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREY LLP  
505 SANSOME STREET, 9TH FLOOR  
SAN FRANCISCO, CA 94111

JOSEPH F. WIEDMAN, ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

SARAH E. LEEPER, ATTORNEY AT LAW  
STEEFEL, LEVITT & WEISS  
ONE EMBARCADERO CENTER, 30TH FLOOR  
SAN FRANCISCO, CA 94111

JOHN GUTIERREZ, DIRECTOR,  
GOVERNMENT AFFAIRS  
COMCAST PHONE OF CALIFORNIA, LLC  
12647 ALCOSTA BLVD., SUITE 200  
SAN RAMON, CA 94583

JOSE JIMENEZ  
COX CALIFORNIA TELCOM, L.L.C.  
2200 POWELL STREET, SUITE 1035  
EMERYVILLE, CA 94608

LEON M. BLOOMFIELD, ATTORNEY AT LAW  
WILSON & BLOOMFIELD, LLP  
1901 HARRISON STREET, SUITE 1620  
OAKLAND, CA 94612

GAYATRI SCHILBERG  
JBS ENERGY  
311 D STREET, SUITE A  
WEST SACRAMENTO, CA 95605

ROBERT SPANGLER  
SNAVELY ING & MAJOROS O'CONNOR &  
LEE INC  
1220 L STREET N.W. SUITE 410  
WASHINGTON, DC 20005

MICHAEL R. ROMANO, DIRECTOR-STATE  
REGULATORY AFFAIRS  
LEVEL 3 COMMUNICATIONS, LLC  
2300 CORPORATE PARK DR STE. 600  
HERNDON, VA 20171-4845

MARJORIE O. HERLTH  
QWEST COMMUNICATIONS CORPORATION  
1801 CALIFORNIA ST., SUITE 4700  
DENVER, CO 80202

LUIS ARTEAGA  
LATINO ISSUES FORUM  
160 PINE STREET, SUITE 700  
SAN FRANCISCO, CA 94111

SUZANNE TOLLER, ATTORNEY AT LAW  
DAVIS WRIGHT TREMAINE  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533

ANITA C. TAFF-RICE, ATTORNEY AT LAW  
1547 PALOS VERDES MALL, SUITE 298  
WALNUT CREEK, CA 94597

MARILYN ASH  
U.S. TELEPACIFIC CORP.  
6101 CHRISTIE AVE.  
EMERYVILLE, CA 94608

LESLA LEHTONEN, VP LEGAL AND  
REGULATORY AFFAIRS  
CALIFORNIA CABLE & TELECOM  
ASSOCIATION  
360 22ND STREET, SUITE 750  
OAKLAND, CA 94612

LUPE DE LA CRUZ  
AARP CALIFORNIA  
1415 L ST STE 960  
SACRAMENTO, CA 95814-3977

WILLIAM D. WALLACE ESQ.  
VERIZON WIRELESS  
1300 I STREET, N.W., SUITE 400 WEST  
WASHINGTON, DC 20005

ROBERT N. KITTEL  
U.S. ARMY LITIGATION CENTER  
901 N. STUART STREET, SUITE 700  
ARLINGTON, VA 22203-1837

ALOA STEVENS, DIRECTOR,  
GOVERNMENT&EXTERNAL AFFAIRS  
FRONTIER COMMUNICATIONS  
PO BOX 708970  
SANDY, UT 84070-8970

SARAH DEYOUNG, EXECUTIVE DIRECTOR  
CALTEL  
50 CALIFORNIA STREET, SUITE 1500  
SAN FRANCISCO, CA 94111

EARL NICHOLAS SELBY  
ATTORNEY AT LAW  
LAW OFFICES OF EARL NICHOLAS SELBY  
418 FLORENCE STREET  
PALO ALTO, CA 94301

DOUG GARRETT  
COX CALIFORNIA TELCOM LLC  
2200 POWELL STREET, SUITE 1035  
EMERYVILLE, CA 94608

GLENN SEMOW  
CALIFORNIA CABLE & TELECOMM. ASSOC.  
360 22ND STREET, STE. 750  
OAKLAND, CA 94612

ETHAN SPRAGUE  
PAC-WEST TELECOMM, INC.  
1776 W. MARCH LANE, SUITE 250  
STOCKTON, CA 95207

CINDY MANHEIM  
CINGULAR WIRELESS  
PO BOX 97061  
REDMOND, WA 98073-9761

MAUREEN K. FLOOD  
TELECOM POLICY ANALYST  
HARRIS, WILTSHIRE & GRANNIS LLP  
1200 EIGHTEENTH STREET, NW  
WASHINGTON, DC 20036

KEVIN SAVILLE  
ASSOCIATE GENERAL COUNSEL  
FRONTIER COMMUNICATIONS  
2378 WILSHIRE BLVD.  
MOUND, MN 55364

CHRISTINA V. TUSAN, ATTORNEY AT LAW  
CALIFORNIA DEPARTMENT OF JUSTICE  
300 SOUTH SPRING ST., 11TH FLOOR  
LOS ANGELES, CA 90012

PAMELA PRESSLEY  
LITIGATION PROGRAM DIRECTOR  
FOUNDATION FOR TAXPAYER&CONSUMER  
RIGHTS  
1750 OCEAN PARK BLVD., SUITE 200  
SANTA MONICA, CA 90405

JACQUE LOPEZ, LEGAL ASSISTANT  
VERIZON CALIFORNIA INC  
CA501LB  
112 LAKEVIEW CANYON ROAD  
THOUSAND OAKS, CA 91362

ESTHER NORTHRUP  
COX CALIFORNIA TELCOM  
5159 FEDERAL BLVD.  
SAN DIEGO, CA 92105

MICHAEL BAGLEY  
VERIZON WIRELESS  
15505 SAND CANYON AVENUE  
IRVINE, CA 92612

THOMAS MAHR, VICE PRESIDENT AND  
GENERAL COUNSEL  
VERIZON WIRELESS  
15505 SAN CANYON AVE E305  
IRVINE, CA 92618

MIKE MULKEY  
ARRIVAL COMMUNICATIONS  
1807 19TH STREET  
BAKERSFIELD, CA 93301

JAN HEWITT  
AT&T CALIFORNIA  
REGULATORY DEPT.  
525 MARKET ST., ROOM 1803  
SAN FRANCISCO, CA 94105

TERESA M. ONO  
AT&T COMMUNICATIONS OF CALIFORNIA,  
INC.  
525 MARKET ST. 18TH FLOOR, 4  
SAN FRANCISCO, CA 94105

YVETTE HOGUE, EXECUTIVE DIRECTOR  
AT&T CALIFORNIA  
525 MARKET STREET, ROOM 1918  
SAN FRANCISCO, CA 94105-2727

MARGARET L. TOBIAS  
TOBIAS LAW OFFICE  
460 PENNSYLVANIA AVENUE  
SAN FRANCISCO, CA 94107

MICHAEL B. DAY, ATTORNEY AT LAW  
GOODIN MACBRIDE SQUERI DAY &  
LAMPREY LLP  
505 SANSOME STREET, SUITE 900  
SAN FRANCISCO, CA 94111

JUDY PAU  
DAVIS WRIGHT TREMAINE LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533

KATIE NELSON  
DAVIS WRIGHT TREMAINE, LLP  
505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO, CA 94111-6533

TERRENCE E. SCOTT  
SBC ADVANCED SOLUTIONS, INC.  
2623 CAMINO RAMON, ROOM 2C111  
SAN RAMON, CA 94583

KRISTIN JACOBSON, MARKET ATTORNEY,  
CONSULTANT  
NEXTEL OF CALIFORNIA, INC.  
1255 TREAT BLVD., SUITE 800  
WALNUT CREEK, CA 94596

MARIA POLITZER  
CALIFORNIA CABLE & TELECOM  
ASSOCIATION  
360 22ND STREET, NO. 750  
OAKLAND, CA 94612

MELISSA W. KASNITZ  
DISABILITY RIGHTS ADVOCATES  
2001 CENTER STREET, THIRD FLOOR  
BERKELEY, CA 94704-1204

JOSH P. THIERIOT, REGULATORY TEAM  
PAC-WEST TELECOMM  
1776 W. MARCH LANE, SUITE 250  
STOCKTON, CA 95207

JOSH THIERIOT  
PAC-WEST TELECOMM, INC.  
1776 W. MARCH LN, STE. 250  
STOCKTON, CA 95207

CHARLES E. BORN, MANAGER-STATE  
GOVERNMENT AFFAIRS  
FRONTIER, A CITIZENS  
TELECOMMUNICATIONS  
PO BOX 340  
ELK GROVE, CA 95759

MARGARET FELTS, PRESIDENT  
CALIFORNIA COMMUNICATIONS ASSN  
1851 HERITAGE LANE STE 255  
SACRAMENTO, CA 95815-4923

SUSAN LIPPER, SENIOR MANAGER,  
GOVERNMENT AFFAIRS  
T-MOBILE USA, INC.  
1755 CREEKSIDE OAKS DIVE, SUITE 190  
SACRAMENTO, CA 95833

SHEILA HARRIS, MANAGER  
GOVERNMENT AFFAIRS  
INTEGRA TELECOM HOLDINGS, INC.  
1201 NE LLOYD BLVD., STE.500  
PORTLAND, OR 97232

ADAM L. SHERR, ATTORNEY AT LAW  
QWEST COMMUNICATIONS CORPORATION  
1600 7TH AVENUE, 3206  
SEATTLE, WA 98191-0000

ANDREW O. ISAR, DIRECTOR  
-STATE AFFAIRS  
ASSOCIATION OF COMMUNICATIONS  
ENTERPRISE  
7901 SKANSIE AVE., SUITE 240  
GIG HARBOR, WA 98335

JOEY PERMAN  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE BRANCH  
320 WEST 4TH STREET SUITE 500  
LOS ANGELES, CA 90013

CHRIS WITTEMAN  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
ROOM 5129  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DALE PIIRU  
CALIF PUBLIC UTILITIES COMMISSION  
TELECOMMUNICATIONS & CONSUMER  
ISSUES BRANCH  
ROOM 4108  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DANA APPLING  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF RATEPAYERS ADVOCATES  
ROOM 4201  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

DENISE MANN  
CALIF PUBLIC UTILITIES COMMISSION  
TELECOMMUNICATIONS & CONSUMER  
ISSUES BRANCH  
ROOM 4101  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

FALINE FUA  
CALIF PUBLIC UTILITIES COMMISSION  
PROGRAM MANAGEMENT &  
IMPLEMENTATION BRANCH  
AREA 3-E  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JANICE L. GRAU  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW  
JUDGES  
ROOM 5011  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JOHN M. LEUTZA  
CALIF PUBLIC UTILITIES COMMISSION  
COMMUNICATIONS DIVISION  
ROOM 3210  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

KAREN MILLER  
CALIF PUBLIC UTILITIES COMMISSION  
PUBLIC ADVISOR OFFICE  
ROOM 2103  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LINDA J. WOODS  
CALIF PUBLIC UTILITIES COMMISSION  
UTILITY & PAYPHONE ENFORCEMENT  
AREA 2-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

LINETTE YOUNG  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER PROTECTION AND SAFETY  
DIVISION  
AREA 2-D  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

MARY JO BORAK  
CALIF PUBLIC UTILITIES COMMISSION  
TELECOMMUNICATIONS & CONSUMER  
ISSUES BRANCH  
ROOM 4101  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

RICHARD SMITH  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW  
JUDGES  
ROOM 5019  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

RUDY SASTRA  
CALIF PUBLIC UTILITIES COMMISSION  
UTILITY & PAYPHONE ENFORCEMENT  
AREA 2-D  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

SARITA SARVATE  
CALIF PUBLIC UTILITIES COMMISSION  
ENERGY DIVISION  
AREA 4-A  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

JAMES W. HOWARD  
CALIF PUBLIC UTILITIES COMMISSION  
UTILITY & PAYPHONE ENFORCEMENT  
770 L STREET, SUITE 1050  
SACRAMENTO, CA 95814